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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**KRYSTAL LOCKETT, et al., individually,
and on behalf of all others similarly
situated,**

Plaintiffs,

v.

**PINNACLE ENTERTAINMENT, INC., et
al.,**

Defendants.

CASE NO. 2:19-cv-00315-APG-NJK

**PLAINTIFFS' UNOPPOSED MOTION
[AND PROPOSED ORDER] FOR AN
EXTENSION OF TIME TO RESPOND
TO FOREIGN SUBSIDIARY
DEFENDANTS' MOTION TO
DISMISS PURSUANT TO RULE
12(b)(2) (ECF No. 30), DEFENDANTS'
MOTION TO TRANSFER (ECF No.
31), AND DEFENDANTS' MOTION TO
DISMISS PURSUANT TO RULE
12(b)(6) (ECF No. 32)**

(FIRST REQUEST)

1 Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1, Plaintiffs
2 move the Court for a seven day extension of time – from the current deadline of April 17,
3 2019, until up to and including April 24, 2019 – to respond to Defendants’ three pending
4 motions: (1) the Foreign Subsidiary Defendants’ Motion to Dismiss Pursuant to Rule 12(b)(2)
5 (ECF No. 30); (2) Defendants’ Motion to Transfer Case to the United States District Court for
6 the Western District of Missouri (ECF No. 31); and (3) Defendants’ Motion to Dismiss
7 Pursuant to Rule 12(b)(6) (ECF No. 32).

8 In support of this unopposed Motion, Plaintiffs state as follows:

9 1. Plaintiffs filed their Class and Collective Action Complaint and Jury Demand
10 on February 21, 2019. (ECF No. 1).

11 2. This Court granted Defendants’ unopposed request for an extension of time
12 (approximately 19 days) to respond to Plaintiffs’ Complaint. (ECF No. 27).

13 3. On April 3, 2019, Defendants filed three motions: (1) the Foreign Subsidiary
14 Defendants’ Motion to Dismiss Pursuant to Rule 12(b)(2) (ECF No. 30); (2) Defendants’
15 Motion to Transfer Case to the United States District Court for the Western District of
16 Missouri (ECF No. 31); and (3) Defendants’ Motion to Dismiss Pursuant to Rule 12(b)(6)
17 (ECF No. 32).

18 4. The current deadline for Plaintiffs to respond to Defendants’ three pending
19 motions is April 17, 2019.

20 5. Plaintiffs are requesting a seven day extension of time, up to and including
21 April 24, 2019, to respond to Defendants’ three pending motions. This is Plaintiffs’ first
22 request for an extension of time.

23 6. Despite the exercise of diligence, counsel for Plaintiffs reasonably believe they
24 will require an additional 7 days (to April 24, 2019) to adequately prepare their responses to
25 Defendants’ motions, which cite numerous cases and attach a substantial volume of
26 evidentiary materials. This extension of time is sought for good cause and to ensure that
27

1 Plaintiffs can fully and fairly present their arguments. This requested extension of time will
2 not prejudice Defendants, nor will it unduly delay the timely disposition of this matter.

3 7. This extension of time is also in the interest of justice because it will allow the
4 parties additional time to discuss a written proposal made by Plaintiffs to Defendants on April
5 9, 2019, that may moot at least some of the issues raised in Defendants' pending motions.
6 Lead counsel for Defendants indicated that she had limited availability to review and discuss
7 that proposal with her clients last week. Plaintiffs are currently awaiting Defendants'
8 response to Plaintiffs' proposal. Lead counsel for Plaintiffs is traveling this week and has
9 limited availability due to an initial case management conference and related meetings
10 occurring in Florida in connection with a new MDL matter.

11 8. Defendants' counsel has confirmed that Defendants do not oppose Plaintiffs'
12 requested extension.

13 WHEREFORE, Plaintiffs respectfully request the Court grant them a seven day
14 extension of time, up to and including April 24, 2019, to respond to Defendants' three
15 pending motions: (1) the Foreign Subsidiary Defendants' Motion to Dismiss Pursuant to Rule
16 12(b)(2) (ECF No. 30); (2) Defendants' Motion to Transfer Case to the United States District
17 Court for the Western District of Missouri (ECF No. 31); and (3) Defendants' Motion to
18 Dismiss Pursuant to Rule 12(b)(6) (ECF No. 32).

19 Dated: April 16, 2019

Respectfully submitted:

HKM EMPLOYMENT ATTORNEYS LLP

/s/ Jenny Foley

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Counsel for Plaintiffs

ORDER

Based upon the above foregoing,

IT IS SO ORDERED.



ANDREW P. GORDON

UNITED STATES DISTRICT JUDGE

DATED: April 16, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of April 2019, I caused to be served a true and correct copy of the foregoing **PLAINTIFFS' UNOPPOSED MOTION [AND PROPOSED ORDER] FOR AN EXTENSION OF TIME TO RESPOND TO FOREIGN SUBSIDIARY DEFENDANTS' MOTION TO DISMISS PURSUANT TO RULE 12(b)(2) (ECF No. 30), DEFENDANTS' MOTION TO TRANSFER (ECF No. 31), AND DEFENDANTS' MOTION TO DISMISS PURSUANT TO RULE 12(b)(6) (ECF No. 32)** on the following persons as follows:

_____ by placing the same for mailing in the United States Mail, in a sealed envelope on which first class postage was prepaid in Las Vegas, Nevada and/or

 X to be sent via electronic filing with the Clerk of the Court using the Court's electronic filing system and serving all parties with an email address of record who have agreed to receive Electronic Service in this action

_____ to be hand delivered to the persons and/or addresses below:

 /s/ Ciara Contreras
An Employee of HKM EMPLOYMENT ATTORNEYS LLP